



BOYS & GIRLS CLUBS
OF THE LOWCOUNTRY, INC.

PROTECTION OF YOUTH POLICY PACKET

OVERVIEW

Current Approach to Safety Policies

The current safety [membership requirements](#) for Boys & Girls Clubs state that all member organizations are required to adopt and adhere to safety policies that protect youth.

Furthermore, all staff and volunteers must be trained on these policies annually.

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CHILD ABUSE PROTECTION POLICY

The priority of Boys & Girls Clubs of the Lowcountry is the physical and emotional safety of its members, staff, and volunteers. Boys & Girls Clubs of the Lowcountry maintains a zero-tolerance policy for child abuse. Boys & Girls Clubs of the Lowcountry implements policies and procedures for members, employees, volunteers, visitors or any victims of sexual abuse or misconduct to report any suspicion or allegation of abuse.

DEFINITIONS

One-on-Contact Prohibition: Boys & Girls Clubs of the Lowcountry prohibits isolated one-on-one interaction between Club participants and staff or volunteers, including board members. This includes prohibiting one-on-one contact at any time at the Club, in vehicles or by phone, text, social media or any other means.

Exceptions may only be made when delivering approved medical or counseling services by a licensed, trained therapist or similar professional according to professional guidelines. All staff and volunteers, including minor staff (under age 18), are strictly prohibited from meeting Club participants outside of any Club-sponsored activities. The only exception to this rule is if the Club participant is a child, grandchild or sibling of a staff member or volunteer.

Child abuse is when an adult or another child, whether through action or by failing to act, causes serious emotional or physical harm to a child. Sexual abuse or misconduct may include but is not limited to:

- Any sexual activity, involvement or attempt at making sexual contact with a person who is a minor (under 18 years old).
- Sexual activity with another who is legally incompetent.
- Physical assault or sexual violence, such as rape, statutory rape, abuse, molestation, or any attempt to commit such acts.
- Unwanted and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, brushing, massaging someone's neck or shoulders and/or pulling against another's body or clothes.
- Inappropriate activities, advances, comments, bullying, gestures, electronic communications, or messages (e.g., by email, text, or social media).

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Grooming behaviors may include but are not limited to:

- Targeting specific youth for special attention, activities, or gifts.
- Isolating youth from family members and friends physically or emotionally. This can include one-on-one interactions such as sleepovers, camping trips and day activities.
- Gradually crossing physical boundaries, full-frontal hugs that last too long, lap sitting or other "accidental" touches.

MANDATED REPORTING

Every staff member or volunteer of Boys & Girls Clubs of the Lowcountry who becomes aware of or has suspicion of child abuse or neglect must immediately report to the CEO or leadership designated by the CEO. The CEO or designated person in the absence of the CEO, is responsible for reporting the incident immediately to the appropriate authorities according to statewide mandated reporting laws, as well as to Boys & Girls Clubs of America (BGCA) within 24 hours via the critical incident system.

REQUIRED TRAINING

Boys & Girls Clubs of the Lowcountry conducts and reports through a BGCA-approved process the following training for all staff members and volunteers with direct repetitive contact with young people (at the intervals noted for each).

Before providing services to young people, and annually thereafter:

- 1. BGCA-approved child abuse prevention
- 2. BGCA-approved mandated reporting
- 3. BGCA-approved grooming prevention

Annually:

- All the policies, including all safety policies, for Boys & Girls Clubs of the Lowcountry.

PHYSICAL INTERACTIONS

Every staff member and volunteer of Boys & Girls Clubs of the Lowcountry is required to maintain appropriate physical contact with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
Side hugs Handshakes High-fives and hand slapping Holding hands (with young children in escorting situations)	Full-frontal hugs or kisses Showing affection in isolated area Lap sitting Wrestling or piggyback/shoulder rides Tickling Allowing youth to cling to an adult’s leg

VERBAL INTERACTIONS

Every staff member and volunteer of Boys & Girls Clubs of the Lowcountry is required to maintain appropriate verbal interactions with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
Positive reinforcement Child-appropriate jokes (no adult content) Encouragement Praise	Name calling Inappropriate jokes (adult-only content) Discussing sexual encounters or personal issues Secrets Profanity or derogatory remarks Harsh language that may frighten, threaten, or humiliate youth

ABUSE AND SAFETY RESOURCES

Boys & Girls Clubs of the Lowcountry prominently displays BGCA-approved collateral that shares ethics hotline, crisis textline and safety helpline information with members, staff, volunteers, and families. We also share all safety policies with parents and guardians upon receiving a youth membership application.

YOUTH-LED PROGRAMMING AND PEER INTERACTION POLICY

Youth members in leadership roles (e.g., junior staff, peer mentors) shall not be placed in supervisory or disciplinary roles over other youth without direct adult oversight. All peer-to-peer leadership interactions must occur under the supervision of a trained adult staff member aged 18 or over.

BULLYING POLICY

The Boys & Girls Clubs of the Lowcountry is committed to providing a safe and civil environment and will not tolerate any form of bullying at any Club activity on or off Club property.

Bullying is unwanted, aggressive behavior that involves real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. Bullying includes actions such as making threats, spreading rumors, attacking someone physically or verbally, and excluding someone from a group on purpose.

Staff and volunteers who observe an act of bullying shall take immediate, appropriate steps to intervene. If the staff member and/or volunteer believes his/her intervention has not resolved the matter, they shall report it to the Club leadership and document the incident in writing. Club leadership must notify the CEO, or designated person in the absence of the CEO, of the documented incident within 24 hours.

Club leadership or appropriate staff member shall inform the parent or guardian of any member who was observed as a victim or perpetrator of bullying. Depending on the frequency and severity of the conduct, intervention, counseling, correction, discipline, and/or referral to law enforcement will be used to remedy the impact on the victim and change the perpetrator's behavior, up to, and including terminating membership.

PROHIBITION OF PRIVATE ONE-ON-ONE INTERACTION POLICY

Boys & Girls Clubs of the Lowcountry is committed to providing a safe environment for members, staff, and volunteers. To further ensure their safety, the organization prohibits all one-on-one interactions between Club members and staff and volunteers (including board members). All staff and volunteers must abide by the following:

- Ensure all meetings and communications between members and staff or volunteers are never private (see definition below).
- Ensure in-person meetings take place in areas where other staff and/or members are present.
- Communicate to another staff member whenever an emergency arises that necessitates an exception to this policy.
- Never initiate private or isolated one-on-one contact with a member.
- Never have a private or isolated meeting or communication with a member. This includes in-person meetings and virtual communications such as texting, video chat and social media between only a staff member or volunteer and a single member.
- Never transport one Club member at a time. This includes transportation in Club or leased vehicles.

Exceptions may only be made when delivering medical or counseling services by a licensed, trained therapist or similar professional. All exceptions shall be documented and provided to Club leadership in advance.

If an emergency arises that necessitates an exception to this policy, the emergency exception shall be communicated to Club leadership as soon as practicable, and ideally before engaging in one-on-one interaction.

ONE-ON-ONE INTERACTION POLICY GUIDANCE

The following guidance should be used when implementing related policies and procedures.

Definition of one-on-one interaction

One-on-one interaction is defined as any private contact or communication (including electronic communication) between any Club participant and an adult, including adult staff, minor staff, volunteers, board

members and others who might encounter members during regular programming and activities.

- **Private** contact/communication is any communication, in person or virtual, that is between one youth member and one adult (18 or over) that takes place in a secluded area, is not in plain sight and/or is done without the knowledge of others. Private places can include but are not limited to vehicles, rooms without visibility to others, private homes, and hotel rooms. Examples of private contact include but are not limited to:
 - Meeting behind closed doors (in rooms without windows or visible sightlines) or any spaces that are not visible to others.
 - One staff member transporting one member in a vehicle.
 - Electronic communications (text, video, social media, etc.) between one member and one staff member or volunteer.
- **Public contact/communication** is any communication or meeting, in person or virtual, that is between at least three individuals, including two staff and one member, one staff and two members or variations of these combinations. Examples of public contact include but are not limited to:
 - Meeting in plain sight of others (e.g., in a quiet corner of an active games room).
 - Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
 - Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).

- Public places can include but are not limited to buses, airports, shopping malls, restaurants, and schools.

Impact on mentoring programs

Mentorship is a key component of Boys & Girls Club programming and has tremendous positive impact on members. Prohibition of one-on-one interaction does not have to negatively affect mentor programs and/or relationship building. Mentors can adjust their practices to include:

- Holding mentor and coaching sessions in areas where other staff and/or members are present or can see you – for example, in large rooms where meetings are visible but not heard.
- Copying parents, staff, or other members (when appropriate) on written and/or electronic communications.
- Scheduling meetings during Club hours and at the Club site.
- Documenting interactions between mentors and youth.

Impact on partnerships with local mentoring organizations

- All local mentors are required to abide by Club policies, including background check requirements and prohibition of one-on-one interaction.
- External mentors are required to abide by all Club safety policies and procedures.
- A written agreement should be in place to determine how and when the external organization assumes custody and responsibility of the member; these procedures should be clearly communicated to parents or guardians.
- Every interaction between mentor and youth will be documented and maintained

Impact on traveling to off-site events and activities

- When travelling to external events such as Keystone, Youth of the Year or other off-site events, the one-on-one policy shall continue to be followed.
- Should the Club take responsibility for transporting members to and/or from an event, one staff member should not transport one single child at any time in a vehicle. Accommodations shall be made to ensure at least three people (two staff and one member or one staff and two members) are together when traveling. As an alternative, public transportation may be used (e.g., taxi, Uber, public transport).
- If this arrangement presents staffing or budget challenges, consider the following:
 - Inviting parents or guardians to attend and/or chaperone their child.
 - Including additional youth (e.g., Junior Youth of the Year) and/or staff in travel plans.
 - Coordinating with other Clubhouses or nearby organizations to travel together.
 - Travelling with additional staff or members.
- Parents and guardians should also provide written consent in each instance in which a member travels to any off-site event. NOTE: Parents or guardians are never allowed to provide consent for one-on-one interaction.
- Similar practices should be in place when coordinating field trips.

Impact on transportation to and from the Club

- When transporting members to and/or from a Club-sponsored event or activity, single members should not be transported alone with one staff person.
- Consider the following to accommodate single children:
 - Modify bus or van routes so single children are not picked up first or dropped off last.
 - Use a bus aide if available.

- Pick up and drop off children in groups.
- Modify staff schedules to ensure multiple staff are present.

Exceptions to policy

Exceptions to the one-on-one policy can be made under the following circumstances:

- When delivering medical or counseling services by a licensed, trained therapist or similar professional (e.g., counselors, social workers).
- When the emotional or physical safety of a member is at risk and a private, one-on-one communication is deemed necessary by Club leadership.
- In emergency situations that could create a safety risk, exceptions can be made (e.g., if a member is not picked up by a parent and leaving them alone at the Club could be a safety risk).

Should exceptions need to be made, the Club shall have policies in place to monitor interactions, including but not limited to:

- Disclosing the meeting to Club leadership and regularly checking in with the member and adult during conversations.
- Placing time limits on conversations.
- Meeting in rooms with clear sight lines (e.g., rooms with windows or glass doors).
- Documenting the interaction.
- In an emergency, disclosing the situation to another staff member before engaging in one-on-one interaction.

PREScription MEDICATION ADMINISTRATION POLICY

Boys & Girls Clubs of the Lowcountry staff may administer prescription medications to members **only with written authorization** from a parent or legal guardian and in accordance with the prescribing healthcare provider's instructions. Staff are not permitted to administer over-the-counter medications without a doctor's note and parent consent.

REQUIRED DOCUMENTATION

Before any prescription medication may be administered:

- A **completed and signed Medication Authorization Form** must be submitted by the parent/legal guardian.
- The form must include:
 - Member's name
 - Name of medication
 - Dosage
 - Time and frequency of administration

- Special instructions (e.g., refrigerate, take with food)
 - Duration the medication is to be administered
 - Physician's signature and contact information
- Medications must be in the **original pharmacy-labeled container** with the child's name and prescription details.

STORAGE OF MEDICATION

- All prescription medications will be stored in a **locked container** in a secure area inaccessible to youth.
- Refrigerated medications will be kept in a **locked refrigerator box** within a designated staff-only refrigerator.
- Medication must **not** be stored in backpacks, lunch boxes, or with the member.

ADMINISTRATION GUIDELINES

- Only staff who have completed BGCL's medication administration training are authorized to dispense prescription medications.
- A **Medication Administration Log** must be maintained for each youth, documenting:
 - Date and time of administration
 - Name of staff member administering the medication
 - Any side effects or unusual observations
- Two staff members should be present during administration when possible—one to administer and one to witness.
- Staff must never alter the dosage or schedule without written direction from a medical provider and parent.

EMERGENCY SITUATIONS

- In case of an adverse reaction or medical emergency, staff must call **911 immediately**, then notify the parent/guardian.
- Staff will follow emergency action plans for youth with known conditions (e.g., asthma, allergies) as provided by the parent/guardian and physician.

SELF-ADMINISTRATION

- Youth may be allowed to self-administer inhalers, EpiPens, or other emergency medications **only with written parent and physician authorization** and after staff review of the plan.
- Staff must supervise self-administration unless otherwise documented in a medical action plan.

RANDOM DRUG SCREENING CLAUSE (STAFF)

To maintain the integrity of this policy and ensure a safe environment for our members, all staff involved in the handling and administration of medications may be subject to **random drug screening** as outlined in Boys & Girls Club of the Lowcountry's drug-free workplace policy.

VIOLATIONS

Failure to follow this policy may result in disciplinary action up to and including termination. Staff must report any concerns or deviations from this policy to Club Leadership immediately.

Supervision and Facilities Policy

SUPERVISION

Boys and Girls Clubs of the Lowcountry is committed to providing a safe environment. All Club activities and program spaces shall always be under continuous supervision by sight or sound (for restroom supervision) by an appropriate adult staff (18 or over). To ensure appropriate supervision, staff, and volunteers:

- Must abide by the prohibition of private one-on-one interaction policy.
- Must abide by all the organization's disciplinary policies and procedures.
- Must ensure that at least one adult staff (18 and over) is present when supervising members.
- Must always maintain proper supervision ratios.
- Must be trained on appropriate supervision tactics and behavior patterns.
- Must ensure that all youth staff and volunteers are supervised by an adult (18 and over) staff member.
- Must immediately notify Club leadership and/or submit written reports detailing supervision issues, accidents, or critical incidents.
- Must never use electronic devices such as cell phones, PDAs or other communication devices while supervising members unless for Club purposes, as defined in the Acceptable Technology Use Policy.

RESTROOM USAGE

Boys & Girls Clubs of the Lowcountry is committed to providing a safe, clean environment and enforces the following restroom policy for members, staff, volunteers, and other adults.

- There will be either a designated adult restroom or procedures to ensure adults and minors never utilize a restroom at the same time.
- Club will either have single-user restrooms or multi-user restrooms with single stalls that can be secured from the inside.
- When using restrooms at public facilities during field trips, a minimum of three youth will be escorted by one staff member, who will wait outside the main entrance of the restroom.

RESTROOM MONITORING

Restrooms shall be regularly monitored by designated staff according to a schedule set by Club leadership. Monitoring includes walk-throughs, inspections and/or any (but not necessarily all) of the best practices outlined below:

- Implementing procedures to limit the number of children using restrooms at the same time.
- Prohibiting younger children and teens from sharing a restroom.
- Positioning staff near restroom entries to maintain auditory supervision of space.
- Designing or renovating multi-user restrooms to eliminate outer doors, while maintaining privacy with individual stalls.

Staff observing unacceptable restroom conditions or incidents shall:

- Immediately notify Club leadership of the incident.
- Document, in writing, restroom conduct incidents and report them to Club leadership as soon as possible in compliance with the Club's Incident Reporting Policy.

ENTRANCE AND EXIT CONTROL

All facility entries and exits shall be controlled and monitored by paid adult staff (18 or over) during all hours of operation, along with a system to monitor and track everyone who is in the facility.

All exit doors shall have an audible alarm to discourage unauthorized use to exit or enter the facility.

Only designated adult staff (18 or over) shall be authorized to possess keys and/or badges to open any facility.

If an employee is supervising a scheduled activity, they shall be responsible for the security of their program space.

FACILITY CONDITION

All program spaces shall have clear lines of visibility and be monitored by adult staff when in use. Areas that are not in use shall remain locked and only accessible by adult staff.

All interior and exterior spaces, hallways, stairs, and stairways shall be monitored, maintained, well-lit, clean, and free of hazards and obstructions. All storage closets and other unused spaces are to be locked during operational hours.

Damages to facilities shall be repaired in a reasonable manner. Damages that pose imminent risk to the health and safety of members, staff or volunteers shall be repaired immediately. If immediate repair to damage that poses imminent risk is not possible, Club leadership shall determine whether temporary or permanent closure of the facility may be required. Any damage to a facility that results in an incident deemed critical to the organization shall be reported to the appropriate authorities as a critical incident.

FOOD AND DRINK

Any distribution, preparation, or consumption of food and/or drink at any facility shall comply with all applicable food services sanitation and public health codes. If food is prepared and served on site, required city or county health department inspection certificates shall be posted. Any dangerous kitchen utensils, including knives, shall be properly and securely stored.

SCREENING AND ONBOARDING POLICY

Boys & Girls Clubs of the Lowcountry is committed to selecting and retaining effective staff and volunteers to serve our youth. As part of the selection process and in accordance with state background check regulations, background checks and screening procedures are conducted in accordance with this policy.

BACKGROUND CHECKS

Boys & Girls Clubs of the Lowcountry conducts criminal background checks of all employees, including minors; board volunteers and others who serve on a standing committee; and all other volunteers, including partners and minors, who have direct repetitive contact with minors.

Name-based or fingerprint-based record searches may be used in any combination, but the background check shall at a minimum:

- Verify the person's identity and legal aliases through verification of a social security number.
- Provide a national Sex Offender Registry search.
- Provide a comprehensive criminal search that includes a national search.
- Provide a comprehensive local criminal search that includes either a statewide or county level criminal search, depending on jurisdiction (*a current list of jurisdictions can be found at www.bgca.net/childsafety*).
- Include any additional background check criteria required by organizational policies, funding or licensing agencies or required in the applicable jurisdiction, such as motor vehicle records, child abuse registry or credit checks.

Such checks will be conducted prior to employment and at regular intervals not to exceed twelve months.

All background check findings shall be considered when making employment or volunteer decisions, and Boys & Girls Clubs of the Lowcountry will not employ potential staff or engage potential volunteers if such individual:

- a. Refuses to consent to a criminal background check.
- b. Makes a false statement in connection with such criminal background check.
- c. Is registered, or is required to be registered, on a state or national sex offender registry.
- d. Has been convicted of a felony consisting of:
 1. Murder
 2. Child abuse
 3. Domestic violence
 4. Abduction or human trafficking
 5. A crime involving rape or sexual assault
 6. Arson
 7. Weapons
 8. Physical assault or battery
 9. Drug possession, use or distribution in the last five years
- e. Has been convicted of any misdemeanor or felony against children, including child pornography.

INTERVIEWING

Boys & Girls Clubs of the Lowcountry will conduct in-person behavioral-based interviews with every candidate for employment or program volunteer service. BGCA will provide behavioral-based interview questions for local use.

REFERENCE CHECKS

Boys & Girls Clubs of the Lowcountry conducts reference checks on any candidate for employment or volunteer with direct repetitive contact with young people. Should candidates for employment have previous experience with a Boys & Girls Club, information on the candidate's eligibility for rehire/volunteering must be obtained from all previous Boys & Girls Clubs for which the candidate worked prior to extending an offer for employment or volunteer service. Additionally, Boys & Girls Clubs of the Lowcountry provides reference materials when asked by other Member Organizations.

STAFF AND VOLUNTEER ONBOARDING

Upon offer of a position, each new Club employee shall receive and confirm in writing receipt of an up-to-date employee policies and procedures manual or handbook that, at a minimum, articulates current:

- Conditions of employment;
- Benefits;
- Rights and responsibilities of employees;
- Club safety policies; and
- Any other important employment-related information.

Before working with any Club members, all staff and volunteers at a minimum shall be given an orientation that includes an overview of the following:

- The organization's mission, goals, policies and procedures and schedule;
- Job descriptions and performance standards for their position;
- The needs and other relevant characteristics of program participants, including cultural and socioeconomic characteristics;
- Personnel and volunteer policies and procedures, including expectations regarding work hours and schedules, breaks and planning time;
- Operational policies and procedures related to safety, supervision, transportation, facilities, emergency operations, etc.; and
- Completion of the required **Child Abuse Prevention Trainings** approved by BGCA.

DRUG- AND ALCOHOL-FREE WORKPLACE POLICY

DRUG AND ALCOHOL POLICY

Boys & Girls Clubs of the Lowcountry is committed to providing a safe environment for members, staff, and volunteers. To further ensure their safety, the organization maintains a drug- and alcohol-free workplace. The unlawful or improper use of drugs – including marijuana, controlled substances, or alcohol in the workplace – presents a danger to everyone. The organization also has a duty to comply with the requirements of the Drug-Free Workplace Act of 1988.

- Employees are prohibited from reporting to work or working while under the influence of alcohol and/or illegal or unauthorized drugs.
- Employees are prohibited from reporting to work or working when the employee is using any legal drugs; exceptions can be made in accordance with state law when the use is pursuant to a doctor's orders and the doctor has advised the employee that the substance does not adversely affect the employee's ability to safely perform his or her job duties. Employees taking any legal drugs that potentially affect job safety or performance are responsible for notifying their supervisor and/or Club leadership so that a determination of job performance or a reasonable accommodation can be made. An employee may not be permitted to perform his or her job duties unless such a determination or reasonable accommodation has been made.
- Employees are prohibited from engaging in the unlawful or unauthorized manufacturing, distribution, dispensing, sale or possession of illegal drugs and alcohol in the workplace, including on organization paid time, on organization premises, in organization vehicles or while engaged in organization activities.
- Employees must notify their supervisor and/or Club leadership immediately of any criminal drug or alcohol violation.
- Employment with the organization is conditional upon full compliance with the foregoing drug- and alcohol-free workplace policy. Any violation of this policy might result in disciplinary action, up to and including discharge.

Boys & Girls Clubs of the Lowcountry further reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks, or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this policy.

SMOKING POLICY

Boys & Girls Clubs of the Lowcountry will comply with all applicable federal, state, and local regulations regarding non-smoking in the workplace in order to provide a work environment that promotes productivity and the well-being of its employees. Smoking in the workplace can adversely affect members, employees, and volunteers. Accordingly, smoking is restricted at all its facilities.

Smoking is defined to include the use of any tobacco-containing products, including cigarettes, cigars, and pipes, as well as the use of electronic cigarettes (e-cigarettes) and vaporizers.

Smoking is prohibited at all Boys & Girls Clubs properties. The smoking policy applies to employees, volunteers, and members while on Club premises or during Club activities (on or off site).

REASONABLE SUSPICION

Staff and or volunteers shall immediately notify Club leadership of any action by an employee or volunteer who demonstrates an unusual pattern of behavior suggesting that they are under the influence of drugs or alcohol. Club leadership will determine whether the employee should be examined by a physician or clinic and/or tested for drugs or alcohol in accordance with the Club's drug-testing policies. Employees and volunteers believed to be under the influence of drugs or alcohol will be required to leave the premises. Any illegal drugs or drug paraphernalia will be turned over to the appropriate law enforcement agency and may result in criminal

prosecution. Examples of behavior suggesting that employees or volunteers are under the influence of drugs or alcohol include but are not limited to:

- Odors (smell of alcohol, body odor or urine);
- Movements (unsteady, fidgety, dizzy);
- Eyes (dilated, constricted or watery eyes or involuntary eye movements);
- Face (flushed, sweating, confused or blank look);
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts);
- Emotions (argumentative, agitated, irritable, drowsy);
- Actions (yawning, twitching); or
- Inactions (sleeping, unconscious, no reaction to questions).

Unusual patterns of behavior that may suggest drug or alcohol misuse include but are not limited to:

- Repeatedly calling in sick;
- Being absent directly before or after holidays and weekends;
- Repeatedly damaging inventory or failing to meet reasonable work schedules; and
- Being involved in frequent accidents that can be related to the use of drugs or other substances.

INSPECTION AND TESTING

Boys & Girls Clubs of the Lowcountry reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this drug- and alcohol-free workplace policy (see "Reasonable Suspicion" above).

Screening, testing and security measures may be used as methods of enforcement, as permitted by applicable state law. It is a violation of this policy to refuse to submit to testing. Tests that are paid for by the organization are the property of the organization, and the examination records will be treated as confidential and held in separate medical files. However, records of specific examinations will be made available, if required by law or regulation, to the employee, persons designated and authorized by the employee, public agencies, relevant insurance companies and/or the employee's doctor.

PRESCRIPTION MEDICATION AND LEGAL DRUGS

Employees and volunteers are prohibited from reporting to work or working when using any legal drugs, except when the use is pursuant to a doctor's orders and the doctor has advised the employee or volunteer that the substance does not adversely affect the employee's or volunteer's ability to safely perform his or her duties.

Employees and volunteers taking a legal drug, such as prescription medication or medical marijuana, that potentially affects job safety or performance are responsible for notifying their supervisor and/or Club leadership so that a determination of job performance or reasonable accommodation can be made. An employee/volunteer may not be permitted to perform his or her job duties unless such a determination or reasonable accommodation is made.

RANDOM DRUG SCREENING

To further promote a safe and drug-free workplace, Boys & Girls Clubs of the Lowcountry reserves the right to conduct random drug screenings of employees and volunteers. These screenings may be conducted without prior notice and will be administered in a non-discriminatory manner. Individuals selected for random screening will be notified privately and provided instructions for compliance. Refusal to submit to a random drug test or a positive result may result in disciplinary action, up to and including termination of employment or volunteer status. All test results will be kept confidential and handled in accordance with applicable laws and organizational policy.

INCIDENT MANAGEMENT POLICY

Clear reporting policies and procedures are an important element in responding to incidents that might occur in Clubhouses. Staff and volunteers must at a minimum immediately report and document all safety incidents that might affect staff, volunteers, members, and others who visit Clubhouses.

GENERAL INCIDENT DESCRIPTION

Safety incidents can include but are not limited to:

- Inappropriate activity between adults (18 and over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of abuse;
- Bullying behavior;
- Inappropriate electronic communications between adults (18 or over) and youth;
- Minor and major medical emergencies;
- Accidents, including slips and falls;
- Threats made by or against staff, volunteers and/or members;
- Physical assaults and injuries, including fights;
- Missing children;
- Criminal activity, including theft and robbery; and
- Other incidents as deemed appropriate by Club leadership.

Safety incidents include those that occur during Club programs, on Club premises and/or during a Club-affiliated program or trip.

INTERNAL INCIDENT REPORTING

Any employee or volunteer who becomes aware of an incident, as defined in this policy, shall immediately complete an incident report, and submit the incident to Club leadership. Club leadership shall immediately report the incident to the CEO, or designated person in the absence of the CEO.

The following information shall be included on an Incident Report:

- Date and location
- Incident details (if applicable)
- Witnesses and contact information
- Names of all involved (youth and staff if applicable)
- All notifications made (first responders, parents, leadership, etc.)

EXTERNAL INCIDENT REPORTING

Boys & Girls Clubs of the Lowcountry follows all applicable mandated reporting statutes and regulations and all applicable federal, state, and local laws (including those around licensing, for licensed organizations) for the protection and safety of youth. Types of incidents reported include but are not limited to:

- Inappropriate activity between adults (18 or over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of child abuse;
- Any form of child pornography;
- Criminal activity, including assault, theft, and robbery; or
- Children missing from the premises.

INCIDENT INVESTIGATION

Boys & Girls Clubs of the Lowcountry takes all incidents seriously and is committed to supporting external investigations of all reported incidents and allegations or internal investigations by the Safety Committee when not an externally reportable incident.

Federal, state, and local criminal and or mandated child abuse reporting laws must be complied with before any consideration of an internal investigation. The internal investigation should never be viewed as a substitute for a required criminal or child protective services investigation.

In the event that an incident involves an allegation against a staff member, volunteer or Club member, the Club shall suspend that individual immediately (employees with pay) and maintain the suspension throughout the course of the investigation.

BGCA CRITICAL INCIDENT REPORTING

Each Member Organization shall immediately report any allegation of abuse or potential criminal matter to law enforcement. In addition, each Member Organization shall report the following critical incidents to BGCA within 24 hours:

- a. Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; sexual misconduct or exploitation (Club-related or not) against any child by a current employee or volunteer; or any Club-related instance by a former employee or volunteer.
 - b. Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; or sexual misconduct or exploitation by a youth towards another youth at a Club site or during a Club-sponsored activity.
 - c. Any child who might have been abducted or reported missing from a Club site or Club-sponsored activity.
 - d. Any major medical emergency involving a child, staff member or volunteer at a Club site or during a Club-sponsored activity leading to extended hospitalization, permanent injury, or death; or a mental health crisis with a child requiring outside care.
 - e. Any instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct, harassment, or exploitation (Club-related or not) involving any staff member; or any Club-related instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct harassment or exploitation against a volunteer or visitor.
 - f. Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
 - g. Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
 - h. Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
 - i. Any criminal or civil legal action involving the organization, its employees, or volunteers, as well as any changes in the status of an open organization-related legal action.
 - j. Negative media attention that could compromise the reputation of the Member Organization or the Boys & Girls Clubs of America brand.
 - k. Any other incident deemed critical by the Member Organization.
- Failure to report safety incidents to Boys & Girls Clubs of America could result in a funding hold or the organization being placed on provisional status.

Anonymous Reporting System:

In addition to direct reporting to Club leadership, youth, families, and staff may submit concerns anonymously via the designated online reporting tool or hotline, the link to which is available on Club bulletin boards and the website. This mechanism is monitored by the CEO and Board Safety Committee.

Trauma-Informed Response Guidelines:

When a youth discloses abuse or concerning behavior:

- Staff must remain calm, listen without judgment, and thank the child for sharing.
- Avoid asking leading or probing questions.
- Do not promise to keep the disclosure a secret; inform the child that you are required to report to keep them safe.
- Immediately notify Club leadership and complete an incident report.

TECHNOLOGY ACCEPTABLE USE POLICY

Boys & Girls Clubs of the Lowcountry is committed to providing a safe use of technology and online safety for members, staff, and volunteers. The acceptable use policy provides the framework for those safety practices and procedures.

CLUB MEMBER USAGE

Before a member will be allowed to use Club technology equipment or their personal device, both the member and his/her parent/guardian will need to read and sign the Technology Acceptable Use policy and return it to the Club. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

Club devices shall include any and all Club-owned existing and/or emerging technologies and devices that can take photographs, play, and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

Personally owned devices shall include any and all member-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

Club purposes shall include program activities, career development, communication with experts and/or Club peer members, homework, and Club activities. Members are expected to act responsibly and thoughtfully when using technology resources. Members bear the burden of responsibility to inquire with staff when they are unsure of the permissibility of a particular use of technology prior to engaging in its use.

Authorized use: Club devices and personally owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of Club devices or personally owned devices in locker rooms, restrooms, and other areas where there is an expectation of privacy.

Appropriate use: Members may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy their peers or others in their community. Any inappropriate use of a Club or personally owned device, as determined by Club staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of membership or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.

Monitoring and inspection: Boys & Girls Clubs of the Lowcountry reserves the right to monitor, inspect, copy, and review any personally owned device that is brought to the Club. Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections. If so, the member may be barred from bringing personally owned devices to the Club in the future.

Loss and damage: Members are responsible for keeping devices with them at all times. Staff are not responsible for the security and condition of the member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

Any inappropriate or unauthorized use of a Club or personally owned device, as determined by Club staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of membership or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies, including, if applicable, referral to local law enforcement.

Members must be aware of the appropriateness of communications when using Club or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online. Inappropriate communication includes but is not limited to the following:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening, or disrespectful language or images typed, posted, or spoken by members;
- Information that could cause damage to an individual or the Club community or create the danger of disruption of the Club environment;
- Personal attacks, including prejudicial or discriminatory attacks;
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking of others;
- Knowingly or recklessly posting false or defamatory information about a person or organization; or
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a member is told to stop sending communications, that member must cease the activity immediately.

Cyberbullying: Members may not utilize any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy their peers or others in their community. This behavior is cyberbullying, which is defined as bullying that takes place using emerging technologies and devices. Any cyberbullying that is determined to disrupt the safety and/or well-being of the Club, Club members, Club staff or community is subject to disciplinary action.

Examples of cyberbullying include, but are not limited to:

- Harassing, threatening or hurtful text messages, emails, or comments on social media.
- Rumors sent by email or posted on social networking sites.
- Embarrassing pictures, videos, websites, or fake profiles.

Members may not attempt to gain unauthorized access to the Club's network, or to any other computer system through the Club's network. This includes attempting to log in through another person's account or accessing another person's files. Members may not use the Club's network to engage in any illegal act, including, but not limited to, arranging for the purchase or sale of alcohol, tobacco, or other drugs; engaging in criminal activity; or threatening the safety of another person. Members may not make deliberate attempts to disrupt the computer system or destroy data by spreading computer viruses.

Monitoring and inspection: Boys & Girls Clubs of the Lowcountry reserves the right to monitor, inspect, copy, and review files stored on Club-owned devices or networks. In addition, Boys & Girls Clubs of the Lowcountry reserves the right to inspect and/or review personally owned devices that are brought to the Club.

Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections, but the member may be barred from bringing personally owned devices to the Club in the future.

Internet access: Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. Boys & Girls Clubs of the Lowcountry reserves the right to monitor communication and internet traffic, and to manage, open or close access to specific online websites, portals, networks, or other services. Members must follow Club procedures to access the Club's internet service.

Loss and damage: Members are responsible for keeping the personal device with them at all times. Staff are not responsible for the security and/or condition of the member's personal device. Furthermore, the Club shall not be liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

Parental notification and responsibility: While the Boys & Girls Clubs of the Lowcountry Technology Acceptable Use Policy restricts the access of inappropriate material, supervision of internet usage might not always be possible. Due to the wide range of material available on the internet, some material might not fit the particular values of members and/or their families. Because of this, it is not considered practical for Boys & Girls Clubs (of the Lowcountry) to monitor and enforce a wide range of social values in student use of the internet. If parents/guardians do not want members to access information beyond the scope of the

Technology Acceptable Use Policy, they should instruct members not to access such materials.

Digital citizenship: Club members shall conduct themselves online in a manner that is aligned with the Boys & Girls Clubs of the Lowcountry Code of Conduct. The same rules and guidelines members are expected to follow offline (i.e., in the real world) shall also be followed when online. Should a member behave online in a manner that violates the Boys & Girls Clubs of the Lowcountry Code of Conduct, that member shall face the same discipline policy and actions they would if their behavior had happened within the physical Club environment.

Club-owned-and-operated technology: *Members are expected to follow the same rules and guidelines when using Club-owned technology. Club technology and systems are the property of the Club, are intended to be used for Club purposes and are to be used during approved times with appropriate supervision.* Club members shall never access or use Club technology or systems without prior approval.

Digital citizenship and technology safety training: All members who wish to use a Boys & Girls Clubs device or equipment will be required to successfully complete a BGCA-provided digital citizenship and technology safety training. This training is required for all members annually.

STAFF AND VOLUNTEER USAGE

Before a staff member can use Club technology equipment or a personal device, he/she shall read and sign the Technology Acceptable Use policy and return it to the Club. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

Club devices: Shall include any and all Club-owned existing and/or emerging technologies and devices that can take photographs, play, and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

Personally owned devices: Shall include any and all staff-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

Club Purposes: Shall include but are not limited to the delivery of program activities, accessing sanctioned training or career development opportunities, communication with experts and/or authorized Club staff and for Club purposes or management of other Club activities, such as member check-in or incident reporting. Staff are expected to act responsibly and thoughtfully when using technology resources. Staff bear the burden of responsibility to ask their supervisor when they are not sure of the permissibility of a particular use of technology prior to engaging in that use.

Authorized use: Personally owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of personally owned devices in locker rooms, restrooms, and other areas where there is an expectation of privacy.

Appropriate use: Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy their peers or others in their community. Any inappropriate use of a personally owned device, as determined by a supervisor, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of employment or volunteer assignment or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.

Monitoring and inspection: Boys & Girls Clubs of the Lowcountry reserves the right to monitor, inspect, copy, and review a personally owned device that is brought to the Club. Staff may refuse to allow such inspections. If so, the staff member may disciplinary action up to and including termination

Loss and damage: Staff are responsible for keeping devices with them at all times. Supervisors and the Club at large are not responsible for the security and condition of the staff member's personal device.

Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

Any inappropriate or unauthorized use of a personally owned device, as determined by a supervisor, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of employment or volunteer assignment or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies, including, if applicable, referral to local law enforcement.

Inappropriate communication includes but is not limited to:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening, or sexual content or disrespectful language or images typed, posted, or spoken by staff or members.
- Information that could cause conflict.
- Personal attacks, including prejudicial or discriminatory attacks.
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking others.
- Knowingly or recklessly posting false or defamatory information about a person or organization.
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a staff member is told to stop sending communications, he/she must cease the activity immediately.

Staff must be aware of the appropriateness of communications when using Club or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online.

Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy others. This behavior is cyberbullying, which is defined as bullying that takes place using existing or emerging technologies and devices. Any cyberbullying that is determined to disrupt the safety and/or well-being of the Club, Club staff, Club members or community is subject to disciplinary action.

Examples of cyberbullying include but are not limited to:

- Harassing, threatening or hurtful text messages, emails, or comments on social media.
- Rumors sent by email or posted on social networking sites.
- Use of embarrassing pictures, videos, websites, or fake profiles.

Communication with Club members: Staff may never use personal devices to communicate directly with a single Club member. Proper protocol dictates that all communication between staff and Club members must include an additional staff member and at least two Club members. This also includes overnight events such as Keystone Conferences and Youth of the Year events.

Monitoring and inspection: Boys & Girls Clubs of the Lowcountry reserves the right to monitor, inspect, copy, and review a personally owned device that is brought to the Club. Staff may refuse to allow such inspections. If so, the staff member may be subject to disciplinary action up to and including termination.

Internet access: Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. Boys & Girls Clubs of the Lowcountry reserves the right to monitor communication and internet traffic and to manage, open or close access to specific online websites, portals, networks, or other services. Staff must follow Club procedures to access the Club's internet service.

Loss and damage: Staff are responsible for keeping devices with them at all times. Supervisors and the Club at large are not responsible for the security and condition of any staff member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

Password and access: To prevent unauthorized access, devices must lock themselves and require authentication using the strongest features available on the device. A minimum standard would require a typed password of at least six characters or numbers, though some devices utilize fingerprint or other biometric technologies.

Digital Communications and Audit Protocol: All staff and volunteers must use only approved organizational platforms (e.g., MyClubHub, Remind) for communication with youth. Texting or social media messaging youth directly via personal devices is prohibited. The organization reserves the right to audit all communication platforms used for Club purposes. Supervisors must conduct spot-checks of digital communication logs quarterly.

Disallowed apps and/or websites: This organization does not allow staff to access the following apps and/or websites during work hours:

Adult or Inappropriate Content

- OnlyFans
- Pornhub or other adult sites
- Omegle
- Chatroulette
- Gambling websites (e.g., DraftKings, FanDuel, BetMGM)

Gambling & Betting Platforms

- DraftKings
- FanDuel
- BetMGM
- Any online casino or betting site

Anonymous Browsing & Proxy Tools

- Tor Browser
- VPN/proxy services not approved by IT
- Web-based proxies (e.g., KProxy, HideMyAss)

TRANSPORTATION POLICY

Boys & Girls Clubs of the Lowcountry is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers, and other adults. Boys & Girls Clubs of the Lowcountry only provides transportation to and from the Clubhouse and various approved off-site locations. The Club only transports youth in Club vehicles or other vehicles approved by Club leadership.

DRIVERS:

- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy of the organization.
- Must keep an updated list of all youth who are transported to and from the Clubhouse and Club-related activities.
- Must confirm that no children are left on a vehicle after every trip (based on a seat-by-seat scan of each vehicle); log must be signed daily to ensure compliance.
- Must perform regular checks to ensure that all members are picked up and dropped off at the appropriate times and locations.
- Must submit written reports detailing issues or incidents involving transportation of members to and from the Clubhouse or to and from Club-related activities.
- Must only transport members in official Club vehicles.
- Must ensure that at least three individuals are present when transporting members. If one child remains to be dropped off, two adults (18 or over) must be present in vehicle.
- Must never transport Club members in personal vehicles.
- Must never use cell phones, PDAs or other communication devices while transporting members to and from the Clubhouse or Club-related activities.
- Must comply with traffic regulations, be conscious of road safety and demonstrate safe driving and other good road safety habits.

VEHICLE

- Each agency vehicle should meet all local, state, and federal inspection and licensing requirements.
- Each vehicle should be inspected as outlined by DMV by staff before every trip for which youth are being transported; any problems with the vehicle must be addressed promptly.
- Regular maintenance should be performed on vehicles and documents/records reflecting that maintenance should be maintained.
- Each vehicle must provide a seat belt for every passenger and fully comply with state and federal seat belt regulations.
- Each vehicle must have a complete first-aid kit that satisfies state licensing requirements.
- Each vehicle must have a working and current fire extinguisher that satisfies state licensing requirements.
- Each vehicle must have reflective traffic warning signs (e.g., triangles or flares) that are stored securely during transport.
- The vehicle must be clean and well maintained and exterior physical damage must be repaired promptly.

SHARED-USE RESTROOMS

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that is empty.
- Youth shall follow the “rule of three” in using public restrooms, with at least two youth and an adult walking to the restrooms and three youth entering a multi-stall facility together. The adult will remain outside the

restroom door to provide auditory surveillance.

- Whenever possible, staff/volunteers will monitor and clear public restrooms before use by members to ensure that the facility is free of adults – and clear of youth not involved in the Club program – before allowing youth to use the facilities. Alternatively, staff members will stand in the restroom doorway and/or hold the door at least partially open when supervising member use of public restrooms. Staff may position themselves inside the restroom near the sinks if positioning at the door is not feasible or is deemed ineffective.
- In a shared-use facility, Boys & Girls Clubs will utilize the best practice of shutting the exterior door to the restroom and using an “Occupied” sign outside of the door to alert others that they must wait until Club members have exited the restroom before they can enter.

Overnight Trip Protocol Clarification:

At no time shall any staff member, volunteer, or board member share overnight accommodations (e.g., hotel rooms, tents, dorms) with youth members. All accommodations must separate adults and youth. Parents or guardians may not waive this requirement.

ACCIDENT OR EMERGENCY PROTOCOL

- Driver should immediately notify Club leadership if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the Clubhouse or Club-related activities.
- Staff shall immediately inform Club leadership if a staff member, volunteer, or board member violates this policy. In such case, the organization will take appropriate disciplinary action, up to and including termination.

Through the appropriate use of Club and community resources, Boys & Girls Clubs strive to mitigate the immediate effects of an emergency and its long-term effects on Club operations and mission by being prepared to effectively respond to and recovery from an emergency.

EMERGENCY OPERATIONS PLAN POLICY

EMERGENCY OPERATIONS PLAN (EOP)

Boys & Girls Clubs shall create and maintain an Emergency Operations Plan (EOP). At minimum, the plan shall encompass the following elements:

- Mitigation, preparedness, response, and recovery for the following types of emergencies:
 - Fire
 - Weather (tornado, flooding, hurricane, etc.)
 - Lockdown (for interior or exterior threat)
 - Bomb threat
 - Suspicious package
- Training/drill schedule and reporting procedures for staff, volunteers, and members.
- Developed and shared with local first responders, such as fire department and law enforcement agencies.

EOP ANNUAL REVIEW

Boys & Girls Club of the Lowcountry leadership will maintain a board-led safety committee that regularly focuses on safety and will have oversight and responsibility for the emergency operations plan. The board-led safety committee will be responsible for reviewing and updating the emergency operations plan annually.

FIRST AID AND CPR TRAINING

Boys & Girls Clubs of the Lowcountry always maintains a minimum of one CPR- or first-aid-trained staff on site during all operating hours when members are being served.

KEY DEFINITIONS

Emergency: An emergency is any event, natural or man-made, whether expected or unexpected, that places life or significant Club assets in danger or threatens the ability to conduct normal business operations and usually involves abnormal time constraints and resource responses.

Mitigation: Mitigation is the effort to reduce loss of life and property by lessening the impact of disasters or emergencies. For mitigation to be effective, we need to take action now — before the next emergency occurs — to reduce human and financial consequences later.

Preparedness: Preparedness helps everyone act quickly and decisively in the face of a disaster or emergency and can minimize loss of property and prevent death and injury. An effective emergency plan should include steps to ensure that those with disabilities or special needs are provided with a proper evacuation strategy.

Annual Safety Audit and Board Review:

An annual safety audit shall be conducted across all Club sites. The audit will include review of incident reports, supervision ratios, staff training logs, facility inspections, and communication platform usage. Results will be shared with the Board-led Safety Committee and incorporated into annual strategic planning. Findings and corrective actions will be documented and tracked.